REMARKS

Claims 3-10 are pending in the present application. Claims 3-10 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Thompson et al.* (U.S. Patent No. 5,335,276) in view of *Caswell et al.* (U.S. Patent No. 6,009,082). The Applicant respectfully traverses this rejection. Favorable reconsideration is requested.

With respect to independent claim 3, the Office Action asserts that *Thompson* discloses all of the features of claim 3 except for the feature of a call-answering functionality that is enabled by the microcontroller in combination with the digital voice memory (page 3 Office Action, first paragraph). While the Applicant agrees that *Thompson* does not disclose the call-answering functionality feature of claim 3, other elements of claim 3 are also not specifically taught or suggested by *Thompson*, and were not addressed in the Examiner's Response.

Specifically, as argued in the Applicant's previous response, the memories 84 and 284 shown in the embodiments of Figures 7 and 8 of *Thompson*, respectively, are merely taught to contain resident applications in core software programs associated with either a handheld communication device 50 or a desktop telephone 150 (see, e.g., col. 10, ll. 60-62, explaining that the resident memory 84 contains resident applications and core software programs). No teaching or suggestion is given by *Thompson* that either of the memories 84, 284 are digital voice memories, let alone digital voice memories that interface with an integrated circuit with which "a call-answering functionality is enabled by the microcontroller in combination with the digital voice memory" as featured in claims 3 and 7. The Office Action has failed to point out where or how *Thompson* actually teaches this feature of claim 3.

Additionally, the Office Action asserts that *Thompson* teaches a radio-cell specific logic module and ascribes the disclosure of application module 100 as equivalent to this claimed feature. However, the Office Action also later attributes this application module 100 as the equivalent of the claimed "interface" without any explanation of how this contradiction of relating two different claim elements to the same, singular element of *Thompson* is reconcilable. Furthermore, the Applicant submits that whether or not this contradiction is reconcilable (which it is not) is subordinate to the facts that the application module 100 of *Thompson* is not an interface to a digital voice memory and not a radio-cell specific logic module, but merely an application module providing applications such as those enumerated in col. 3, lines 41-55.

Finally, the claimed feature of "an interface to a digital voice memory with which a call-answering functionality is enabled via the microprocessor in combination with the digital voice memory: is not disclosed by *Thompson*. The application module 100, which is alleged to be equivalent to the claimed "interface," is not shown or taught to enable a call-answering functionality via a microprocessor in combination with a digital voice memory.

Furthermore, *Caswell* does not solve the deficiencies of *Thompson* as enumerated above, as *Caswell* does not teach or suggest these features. In contrast, Caswell does not disclose an integrated circuit nor a mobile radio device as claimed in the present invention, but rather discloses a computer-assisted communications system using a peripheral computer running software components over a communications line (col. 4, lines 23-29; col. 4, lines 53-62). The "telephone module" disclosed in *Caswell* teaches a software icon activated in a Windows®-based menu to route and/or activate calling features utilizing a modem (col. 5, lines 5-50; col. 2, lines 35-42).

Moreover, one of ordinary skill in the art would not be motivated to combine the teachings of *Caswell* with *Thompson* to arrive at the features of claims 3 and 7. In particular, the recited motivation to combine (i.e., "in order to use a telephone link as a communication link for high speed transmission of pre-recorded material and control codes to facilitate that transmission, limiting the use line [sic] for voice messaging as a recording or playback device") fails to yield a device that would include or even need to include the claimed "interface to a digital voice memory with which a call-answering functionality is enabled by the microcontroller in combination with the digital voice memory." *Thomson* acknowledges the use of devices with personal computers, and in turn disparages the use of these devices as not being able to provide adequate two-way communication and further require additional hardware and software for effective consumer use (col. 2, lines 21-33). Since *Thomson* disparages the use of personal computers, why would one of ordinary skill in the art be motivated to turn to the very same technology (*Caswell*) that is being eschewed? This clearly demonstrates that *Caswell* teaches away from *Thomson*. Thus, the Applicant submits that no motivation is extant to motivate one of ordinary skill in the art to arrive at all of the elements of claim 3 and 7.

According to the above comments, the Applicant respectfully submits that the combination of *Thompson* and *Caswell* does not render the features of claims 3 and 7 obvious and requests that the rejection be withdrawn, accordingly. Since the remainder of the claims

depend directly and/or indirectly from these claims, the Applicant submits that they also are allowable for the reasons given above. The Applicant respectfully submits that claims 3-10 are allowable over the prior art of record and request that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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